

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Case No. 20-CV-954-WO-JLW**

FARHAD AZIMA,

Plaintiff,

v.

NICHOLAS DEL ROSSO and VITAL
MANAGEMENT SERVICES, INC.,

Defendants.

**NOTICE OF DEFENDANTS'
OBJECTIONS TO OR APPEAL
OF SPECIAL MASTER'S
REPORT AND DECISION #1
AND REQUEST FOR STAY**

Defendants Nicholas Del Rosso and Vital Management Services, Inc. hereby give notice to the Court of the filing of its Objections to the Special Master's February 6, 2024 Report and Decision #1 ("Report", D.E. 316). The Objections are filed contemporaneously with this Notice, which are incorporated herein, are made pursuant to Fed. R. Civ. P. 53(f)(2) and this Court's Order for the Appointment of Special Discovery Master (D.E. 313 ¶¶ 13–14) (the "Appointment Order").¹

As further set forth in Defendants' Objections and accompanying exhibits, Defendants object to the portions of the Report specifically dealing with the assertion of privilege and concluding that (1) Defendants were "not authorized to assert any privileges" belonging to non-party Government of Ras

¹ The Appointment Order adopts the parties Joint Agreement Regarding Special Master (D.E. 312-1) (the "Joint Agreement"), which details the process for appealing a Special Master decision.

Al Khaimah and its related instrumentalities (“RAK”), and (2) that RAK must “appear before the Court to assert any privileges.”

Consistent with the parties Joint Agreement (D.E. 312-1), and as further set out in Defendants’ Objections, Defendants request a partial stay of the Report pending the Court’s consideration of and ruling on their Objections.

Respectfully submitted, this the 13th day of February, 2024.

**NELSON MULLINS RILEY &
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CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of February 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send electronic notification of filing to the following:

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This, the 13th day of February, 2024.

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